

Case: 22-10964 Date: 07/23/2022 Depositor: Jeffrey Zats

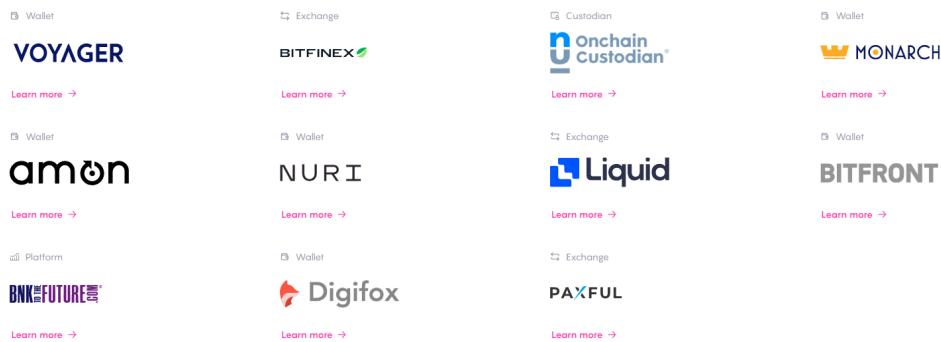
Honorable Judge Glenn,

While many others have been pointing to Alex Mashinsky's endless misrepresentations and lies about Celsius, I want to shift gears to talk about something that nobody has bought up yet.

Celsius offered an "API Program" that allowed other businesses to white-label Celsius's Earn Product into their own applications. By doing this, other apps were able to offer the benefit of earning yield to their customers and let Celsius do most of the heavy lifting.

As you can see, Celsius had quite a few partners using its tech via API:

Meet our Partners



One partner relationship in particular that I believe needs to be investigated is Digitfox.

Digifox was effectively a white-labeled Celsius clone run by another entity. More specifically, they offered yield services through Celsius Earn Product API.

Digifox announced on June 1st that they were closing their doors on June 5th, exactly 1 week before Celsius halted withdrawals.



I have a suspicion that Celsius gave its corporate partners an early warning that the platform was on the verge of implosion, instead of providing that same level of transparency to its own users.

2 days after Digifox closed its doors, Celsius published a blog post titled "*Damn the Torpedoes, Full Speed Ahead*" where they said "*Celsius has the reserves (and more than enough ETH) to meet obligations, as dictated by our comprehensive liquidity risk management framework.*" - As we know now, this was false.

In addition to investigating Alex Mashinsky's countless lies that others have noted, I highly recommend investigating this too. This could lead to some very important discoveries.

Thank you for everything you're doing. I hope and pray every day that Alex Mashinsky will be held legally liable for the damage he's caused to so many users and their families.

Sincerely,
Jeffrey Zats

07/23/2022